



MAINTENANCE CHEMICALS AND OTHERWISE USE



DON'T FORGET ABOUT OTHERWISE USE!

- Otherwise use chemicals related to facility maintenance activities are easily overlooked and not accounted for in threshold determinations
- Identify otherwise use activities even if a manufacturing and/or processing threshold has been exceeded for a Section 313 chemical
 - Releases and waste management activities would be reportable
- Develop tools to identify and account for the otherwise use of these chemicals in mixtures or trade name products

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WHAT CHEMICALS ARE OTHERWISE USED AT YOUR FACILITY?

- List chemicals otherwise used at your facility and how they are used:

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MAINTENANCE CHEMICALS AND OTHERWISE USE

- Otherwise uses of Section 313 chemicals include:
 - Maintaining process-related equipment and structures
 - Cleaning process-related equipment, parts, and structures
 - Waste treatment
 - Process-related building cooling/heating
 - Process-related fuel use

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MAINTENANCE CHEMICALS OTHERWISE USED

■ Examples of Section 313 chemicals otherwise used for maintenance of process equipment and structures:

- Xylene in paint applied to process equipment
- Zinc compounds in lubricating oils
- Metal alloys in parts tooling and equipment repair
- Metal compounds in welding rods used to repair equipment and structures
- Metal compounds in refractory bricks used to line furnaces

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CLEANING CHEMICALS OTHERWISE USED

■ Examples of Section 313 chemicals otherwise used for cleaning process equipment and structures:

- 1,2,4-trimethylbenzene in diesel fuel used to clean bulk storage tanks
- Phenol in paint strippers
- Dichlorofluoromethane in contact cleaners
- Glycol ethers in aqueous-based cleaning solutions

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ADDITIONAL CHEMICALS OTHERWISE USED

■ Examples of Section 313 chemicals otherwise used at facilities:

- HCFC-22 used to refrigerate product before sale
- Ammonia used to treat process water
- Ethylbenzene in fuel used to power process equipment
- Ethylene glycol sprayed on coal piles to prevent freezing
- Pesticides used in cooling towers to prevent algae

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OTHERWISE USE CHEMICAL EXEMPTIONS

■ For Section 313 chemicals otherwise used for maintenance or cleaning of non-process-related equipment and structures, the following may apply:

- Routine janitorial or facility grounds maintenance exemption
 - » Example: Xylene in cleaners used to clean the employee cafeteria
- Structural component exemption
 - » Example: Toluene in paint used to paint the employee recreation center

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OTHERWISE USE CHEMICAL EXEMPTIONS

- **Motor vehicle exemption if the chemical is used to maintain motor vehicles operated by the facility**
 - Example:
 - » Xylene in engine degreasers used to maintain the facility motor vehicles
- **Personal use exemption if the chemical is contained in non-process related items solely for employee personal use**
 - Example:
 - » Chlorine to treat on-site drinking water

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ARTICLES EXEMPTION

- **For Section 313 chemicals contained in like items (e.g., tools) otherwise used for maintenance of equipment and structures:**
 - Articles exemption provided that the item:
 - » Is formed into a specific shape or design during manufacture; and
 - » Has end-use functions dependent in whole or in part on its shape or design during end-use; and
 - » Does not release a Section 313 chemical under normal processing or otherwise use conditions at a facility (≤ 0.5 pounds)

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ACCOUNTING TIPS FOR OTHERWISE USE CHEMICALS

- **Develop methods for orchestrating data collection of mixtures and trade name products being otherwise used**
 - Coordinate with purchasing/vendors
 - Develop inventory controls
 - Require maintenance logs for process equipment
 - Require requisition or "sign out" procedure for Section 313 chemicals from tool cribs and supply rooms
 - Take year-end inventories

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